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September 6, 2023

VIA ECF

The Honorable Robert Kirsch
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *UMG Records, Inc., et al. vs. RCN Telecom Services, LLC, et al.*
Civil Action No. 3:19-cv-17272-RK-TJB

Dear Judge Kirsch:

This firm represents Defendants (collectively, "RCN") in the above-referenced matter. Pursuant to Local Rule 301.1(e)(6), Plaintiffs and Defendants (collectively, the "Parties") write jointly to request that the Court extend the mediation stay in this matter by 30 days, from September 6, 2023 to October 6, 2023.

On June 8, 2023, the Court entered a Mediation Order (ECF No. 250) referring this case to mediation with The Honorable Freda L. Wolfson (ret.). Pursuant to Local Rule 301.1(e)(6), the Mediation Order caused all proceedings in this matter to be stayed for 90 days—i.e., through September 6, 2023.

Mediation with Judge Wolfson is scheduled for September 28, 2023. The Parties attempted to schedule an earlier mediation, but it was difficult to identify suitable dates in view of the schedules of the Parties, the Parties' in-house and outside counsel, and Judge Wolfson.

The Parties agree that extending the stay to accommodate the mediation date will further the purpose of the mediation, consistent with Local Rule 301(e)(6). The Parties do not intend to seek any further extension of the stay.

Accordingly, the Parties respectfully request that the Court enter an order extending the stay by 30 days, through October 6, 2023.

SO ORDERED


Robert Kirsch, U.S.D.J.

Date: 9/18/23

CC: All counsel of record via ECF

Respectfully Submitted,

/s/ Edward F. Behm, Jr.

Edward F. Behm, Jr.